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*Counsel to the Plan Administrator for the  
Debtors*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
In re: : Chapter 11  
:  
Gawker Media LLC, *et al.*,<sup>1</sup> : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
:  
-----X

**CERTIFICATE OF NO OBJECTION TO  
(NON-SUBSTANTIVE) OMNIBUS OBJECTION OF THE PLAN ADMINISTRATOR,  
ON BEHALF OF THE DEBTORS, TO CERTAIN CLAIMS**

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1. On July 25, 2019, William D. Holden, as the plan administrator (the “Plan Administrator”) for Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”) and Gawker Hungary Kft. “v.a.”, f/k/a Kinja, Kft. (“Gawker Hungary,” and together with Gawker Media and GMGI, the “Debtors”) filed the *(Non-Substantive) Omnibus Objection of the Plan Administrator, on Behalf of the Debtors, to Certain Claims* [Docket No. 1202] (the “Omnibus Objection”).

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<sup>1</sup> The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The Debtors’ mailing addresses are c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, NY 10022.

2. Concurrent with the filing of the Omnibus Objection, the Plan Administrator filed the *Notice of (Non-Substantive) Omnibus Objection of the Plan Administrator, on Behalf of the Debtors, to Certain Claims* (the “Notice of Hearing”), scheduling a hearing on the Omnibus Objection for August 27, 2019, at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”).

3. On July 25, 2019, the Debtors’ claims and noticing agent, Prime Clerk LLC, served the Notice of Hearing and Omnibus Objection as set forth in the *Affidavit of Service* [Docket No. 1203].

4. Objections to the Omnibus Objection were due no later than August 20, 2019, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

5. The undersigned certifies that the Plan Administrator has not received any answer, objection or other responsive pleading with respect to the Omnibus Objection, and that no such answer, objection or other responsive pleading has appeared on the Court’s docket in the above-captioned chapter 11 cases.

*[Remainder of page intentionally left blank]*

6. There having been no answer, objection, or other responsive pleadings filed by the  
Objection Deadline, the Plan Administrator respectfully requests that the Court enter the proposed  
order sustaining the Omnibus Objection, annexed hereto as **Exhibit A**.

Dated: August 26, 2019  
New York, New York

/s/ Gregg M. Galardi  
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**EXHIBIT A**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re: : Chapter 11  
Gawker Media LLC, *et al.*,<sup>2</sup> : Case No. 16-11700 (SMB)  
Debtors. : (Jointly Administered)  
-----X

**ORDER GRANTING (NON-SUBSTANTIVE) OMNIBUS OBJECTION OF THE PLAN  
ADMINISTRATOR, ON BEHALF OF THE DEBTORS, TO CERTAIN CLAIMS**

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Upon the objection (the “Objection”)<sup>3</sup> of the Plan Administrator, on behalf of the above-caption debtors (collectively, the “Debtors”), for entry of an order (the “Proposed Order”) (i) disallowing and expunging in its entirety the Late Filed Claim identified on **Schedule 1** to the Proposed Order attached hereto and (ii) disallowing and expunging in its entirety the No Liability Claim identified on **Schedule 2** to the Proposed Order attached hereto; and upon the Holden Declaration; and the Court having found that it has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue of this proceeding and the Objection is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and upon consideration of the Objection and the Holden Declaration; and the Court

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<sup>2</sup> The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The Debtors’ (as defined herein) mailing addresses are c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30<sup>th</sup> Floor, New York, NY 10022.

<sup>3</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

having found and determined that the relief sought in the Objection is in the best interests of the Debtors and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The relief requested in the Objection is granted to the extent provided herein.
2. The Late Filed Claim identified on **Schedule 1** attached hereto is hereby disallowed and expunged in its entirety for the reasons set forth in the Objection.
3. The No Liability Claim identified on **Schedule 2** attached hereto is hereby disallowed and expunged in its entirety for the reasons set forth in the Objection.
4. Prime Clerk LLC, the Debtors' claims and noticing agent, is authorized to cause the Claims Register to be amended to reflect the terms of this Order.
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Plan Administrator is authorized and empowered to take all actions as may be necessary and appropriate to implement the terms of this Order.
7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2019  
New York, New York

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THE HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE